

## ***Comments on the CLI Phase II Report Draft***

Most Stakeholders who had been involved throughout Phase II agreed that the Phase II report reflects the CLI Phase II process accurately . Many comments on the CLI Phase II Report Draft were editorial or clarifying in nature. People and groups also commented upon whether or not they agreed with the report's findings and recommendations. Some people also suggested additions to the report.

Many comments were submitted on the Storage and Disposal chapter of the report. Industry representatives commented on the appropriateness of including certain sections in the Storage and Disposal chapter (Chapter 6), particularly in the chapter sub-section describing the Storage and Disposal Subgroup activities. They argued that certain topics should not be included in this section because they were not officially discussed within the Subgroup. Commenters offered their opinions on whether or not they agreed with the proposed language, and offered arguments highlighting advantages and disadvantages for each proposed statement. Additionally, a few commenters pointed out potential problems with some of the proposed storage and disposal language (i.e., that they may violate certain regulations or policies). In addition to providing feedback on the proposed language suggested by the Storage and Disposal Subgroup, some commenters offered their own suggestions for alternative statements.

Comments were also issued about the label language tested in the quantitative and qualitative research. For example, language regarding the Federal Use statement was questioned (see discussion below).

One commenter from the EPA voiced many criticisms of the report. The commenter:

- # felt that some of the CLI Phase II findings and conclusions were not supported by the data presented in the report;
- # questioned how specific aspects of the label changes would be implemented (e.g., use of “white space,” elimination of needless words, specification of how long to wait before re-entering a treated area);
- # disagreed with parts of the CLI Phase II process; and
- # criticized aspects of the research design (e.g., poorly-designed mock labels, unclear and leading wording of some research questions).

NAHMMA expressed its frustration that EPA has failed to make a policy decision on pesticide disposal to be included in this Phase II Report. The absence of meaningful outcome on this area of the project is very disconcerting to state and local governments.